

Objection Deadline: May 3, 2016, at 4:00 p.m. (Eastern Time)
Hearing Date: May 10, 2016, at 10:00 a.m. (Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
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LEHMAN BROTHERS HOLDINGS INC., et al.,	:
	:
Debtors.	:
	:
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Chapter 11
Case No.: 08-13555 (SCC)
(Jointly Administered)

**NOTICE OF MOTION BY LEHMAN BROTHERS HOLDINGS INC.
TO ENFORCE ITS PLAN AND CONFIRMATION ORDER AGAINST
DEUTSCHE BANK AG, LONDON BRANCH AS THE HOLDER OF
CERTAIN CLAIMS AND FOR OTHER ANCILLARY RELIEF**

PLEASE TAKE NOTICE that on April 21, 2016, Lehman Brothers Holdings Inc. (“**LBHI**”), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors* for the entities in the above referenced chapter 11 cases, filed the *Motion by Lehman Brothers Holdings Inc. to Enforce Its Plan and Confirmation Order Against Deutsche Bank AG, London Branch as the Holder of Certain Claims and for Other Ancillary Relief* (the “**Motion**”), together with the supporting declaration and proposed order, and that a hearing (the “**Hearing**”) for entry of an order granting the Motion will

be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), One Bowling Green, New York, New York 10004, on **May 10, 2016, at 10:00 a.m. (Eastern Time)**, or such other time as the Court may determine.

PLEASE TAKE FURTHER NOTICE that any responses to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, preferably in text-searchable Portable Document Format (PDF) (with a hard copy delivered directly to Chambers) in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov) and shall be served in accordance with General Order M-399 upon (i) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 623; (ii) counsel for LBHI, Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110 (Attn: William F. Dahill, Esq., and John D. Giampolo, Esq.); and (iii) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq., Susan Golden, Esq., and Andrea B. Schwartz, Esq.), so as to be so filed and received by no later than **May 3, 2016, at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Motion or any relief requested therein, LBHI may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order

annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York
April 21, 2016

/s/ John D. Giampolo

William A. Maher
Paul R. DeFilippo
William F. Dahill
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Mara R. Lieber

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